

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

JOHN MARKS, ET. AL.	§	
<i>Plaintiffs,</i>	§	
v.	§	CASE NO: 3:24-CV-00243
	§	
CITY OF MANVEL, ET. AL	§	
<i>Defendants.</i>	§	

**SUBPOENA TO BRAZORIA COUNTY DISTRICT ATTORNEY'S OFFICE FOR THE
PRODUCTION OF DOCUMENTS IN A CIVIL ACTION**

TO: Any Sheriff or Constable of the State of Texas or other person authorized to serve and execute subpoenas as provided in FEDERAL RULE OF CIVIL PROCEDURES 45.

YOU ARE COMMANDED TO SUMMON a non-party witness, **Brazoria County District Attorney's Office, at 111 E Locust St #408a, Angleton, TX 77515** to produce to Michael W. Kerensky of The Kerensky Law Firm, located at 440 Louisiana, St. Suite 2300, Houston, TX 77002 on or before January 1, 2025, all documents, items, and things described in the attached and incorporated Exhibit A for inspection and copying to be used as evidence in this case.

Brazoria County District Attorney's Office is commanded to produce and/or permit inspection and copy of the documents or tangible things described in Exhibit A. Pursuant to the FEDERAL RULE OF CIVIL PROCEDURE 45, Plaintiff will pay the reasonable cost of complying with the record request, including costs of reproduction, postage, research, delivery, and attorneys' fees.

The following provisions of FED. R. CIV. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

THIS SUBPOENA IS ISSUED UNDER THE AUTHORITY OF THE FEDERAL RULE OF CIVIL PROCEDURE 45. A FAILURE TO COMPLY WITH THIS SUBPOENA MAY RESULT IN AN ENFORCEMENT ACTION.

The Subpoena is issued at the request of Plaintiff Freddie Douglas whose attorney of record is the undersigned, Michael W. Kerensky.

DO NOT FAIL to return this subpoena, with return thereon, showing the manner of execution.

ISSUED ON December 17, 2024.

Respectfully submitted,

MIKE KERENSKY, PLLC

By: 

Michael W. Kerensky
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Houston, Texas 77002
713 228 5100 – Telephone
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**ATTORNEY FOR PLAINTIFF
FREDDIE DOUGLAS**

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JOHN MARKS, ET. AL.

Plaintiffs,

VS.

CITY OF MANVEL, ET. AL

Defendants.

§
§
§
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§
§
§

CASE NO. 3:24-CV-00243

AFFIDAVIT OF SERVICE

On this day personally appeared **Antonio Perez** who, being by me duly sworn, deposed and said:

"The following came to hand on **Dec 27, 2024, 1:51 am**,

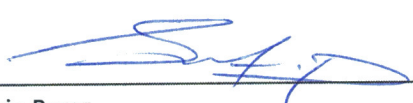
NOTICE OF SUBPOENA DUCES TECUM ISSUED TO BRAZORIA COUNTY DISTRICT ATTORNEY'S OFFICE IN A CIVIL ACTION WITH EXHIBIT A; SUBPOENA TO BRAZORIA COUNTY DISTRICT ATTORNEY'S OFFICE FOR THE PRODUCTION OF DOCUMENTS IN A CIVIL ACTION WITH EXHIBIT A; ,

and was executed at **111 East Locust Street #408a, Angleton, TX 77515** within the county of **Brazoria** at **12:05 PM** on **Thu, Jan 02 2025**, by delivering a true copy to the within named

BRAZORIA COUNTY DISTRICT ATTORNEY'S OFFICE BY DELIVERING TO MARY SHINE, CHIEF CIVIL DIVISION

in person, having first endorsed the date of delivery on same.

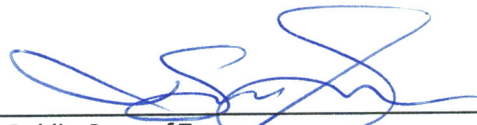
I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."



Antonio Perez
Certification Number: PSC-12339
Certification Expiration: 10/31/25

BEFORE ME, a Notary Public, on this day personally appeared **Antonio Perez**, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are within his or her personal knowledge and are true and correct.

SUBSCRIBED AND SWORN TO ME ON 1-10-2025



Notary Public, State of Texas

